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6 Attorney for Rafael Martinez

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.
14 RAFAEL MARTINEZ,
15 Defendant.

Case No. 2:19-cr-00129-JCM-DJA-2

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
17 Acting United States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel for
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and Navid
19 Afshar, Assistant Federal Public Defender, counsel for Rafael Martinez, that the Revocation
20 Hearing currently scheduled on January 21, 2022, be vacated and continued to a date and time
21 convenient to the Court, but no sooner than twenty-one (21) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. Counsel is unable to communicate with client due to long delays in securing
24 appointment at jail.
25 2. Matter is close to resolving. Counsel needs to review with client.
26 3. Defendant is incarcerated and does not object to a continuance.

1 4. Additionally, denial of this request for continuance could result in a
2 miscarriage of justice.

3 This is the first request for continuance filed herein.

4 DATED this 18th day of January, 2022.

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6 RENE L. VALLADARES
7 Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

8 By /s/ Navid Afshar

By /s/ Jim W. Fang

9 NAVID AFSHAR
10 Assistant Federal Public Defender

JIM W. FANG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 RAFAEL MARTINEZ,

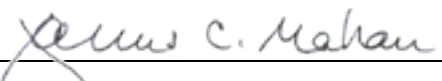
7 Defendant.
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Case No. 2:19-cr-00129-JCM-DJA-2

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,
11 IT IS THEREFORE ORDERED that the Revocation Hearing currently scheduled on January
12 21, 2022 at the hour of 10:30 a.m., be vacated and continued to March 4, 2022 at the hour of
13 10:30 a.m.

14 DATED January 19, 2022.

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17 UNITED STATES DISTRICT JUDGE
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